Law Office of Richard D. Kinkade, P.C. State Bar No. 11477350 2121 W. Airport Freeway, Suite 400 Irving, Texas 75062 Tel. 972.256.4444 / Fax 972.258.8817 ATTORNEY FOR DEBTOR

IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

IN RE:	§	CASE NO. 13-32515-BJH
BETTY RUTH ARTIS	§	
	§	
	§	
DEBTOR	§	CHAPTER 13
	§	

DEBTOR'S MOTION TO REOPEN AND DISCHARGE CASE

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, Debtor, Betty Ruth Artis, by and through her attorney of record, Richard D. Kinkade, P.C., who hereby moves this Court to Reopen and Discharge case and in support thereof would respectfully show the Court as follows:

- 1. Debtor filed Chapter 13 Bankruptcy on 5/11/2013.
- 2. The case was closed without a Discharge on 6/22/2018 for failure to file a Certification and Motion for Entry of Chapter 13 Discharge. Debtor reviewed and signed the Motion on 7/12/2018.

WHEREFORE, PREMISES CONSIDERED, the Debtor respectfully requests that the Court Reopen and grant the Debtor her Discharge and for such further and other relief to which the Debtor may be justly entitled.

Respectfully Submitted,

/s/ Richard D. Kinkade Richard D. Kinkade, State Bar No. 11477350 2121 West Airport Freeway, Suite 400 Irving, Texas 75062 Tel. 972.256.4444 / Fax 972.258.8817 ATTORNEY FOR DEBTOR

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing instrument via ecf and/or first-class mail, postage prepaid, to the following:

TRUSTEE:

Thomas Powers 105 Decker Court Suite 1150 Irving, TX 75062

U.S. TRUSTEE:

United States Trustee 1100 Commerce St., Rm. 976 Dallas, TX 75242

DEBTOR:

Betty Ruth Artis 736 Cresent Dr DeSoto, TX 75115

and to all creditors on the attached mailing matrix.

Dated this 12th day of July, 2018.

/s/ Richard D. Kinkade RICHARD D. KINKADE ATTORNEY FOR DEBTOR